

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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IN THE MATTER OF: : CHAPTER 13  
CYNTHIA SANTIAGO, : CASE #20-10164/ELF  
Debtor. : Hearing Date: 7-21-2020

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

Debtor, Cynthia Santiago, by and through her attorney, Robert N. Braverman, Esquire of McDowell Law, PC hereby responds to the Chapter 13 Trustee's Motion to Dismiss as follows:

1. Our office is addressing a secured claim outside plan and surrender of vehicle via a modified plan.
2. Our office is working with the Homeowners Association who mistakenly filed an unsecured lien.

WHEREFORE, debtor hereby requests that the Trustee's Motion to Dismiss be DENIED.

Date: June 17, 2020

/s/Robert N. Braverman  
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